


From: Charles Molster cmolster@molsterlaw.com
Subject: Re: USA v. Google 1:23cv0108 - Zedo Confidential Information
Date: July 25, 2024 at 2:17 PM
To: Hibbler, Leah lhobbler@paulweiss.com
Cc: Charles Molster cmolster@molsterlaw.com, Morgan, Erin J ejmorgan@paulweiss.com, Phillips, Jessica E jphillips@paulweiss.com, Goodman, Martha mgoodman@paulweiss.com, Craig Reilly craig.reilly@ccreillylaw.com



Thanks Leah - you are correct, I did mean Google, not Plaintiffs, and I appreciate your prompt response on that issue.

Best regards,

Chip
703 346 1505

The Law Offices of Charles B. Molster, III PLLC
2141 Wisconsin Avenue, N.W., Suite M
Washington, D.C. 20007
(o) 202.787.1312
(c) 703.346.1505
cmolster@molsterlaw.com
www.molsterlaw.com

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On Jul 24, 2024, at 3:46 PM, Hibbler, Leah <lhobbler@paulweiss.com> wrote:

Hi Chip,

Thank you for reaching out about Zedo. I do not represent Plaintiffs, but assuming you've got the same questions for Google, I've confirmed that Google did not include any documents or data produced by Zedo on its exhibit list, and none of the expert figures on our exhibit list refer to Zedo. However, we cannot provide information about whether Zedo may be referenced in the course of trial. Regarding the question in the last paragraph of your email, we will revert soon.

Best,

Leah
Leah R. Hibbler | Associate
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW | Washington, DC 20006-1047
+1 202 223 7391 (Direct Phone) | +1 202 380 0585 (Direct Fax)
lhobbler@paulweiss.com | www.paulweiss.com
Pronouns: She/Her

From: Charles Molster <cmolster@molsterlaw.com>
Sent: Wednesday, July 24, 2024 9:24 AM
To: Hibbler, Leah <lhobbler@paulweiss.com>
Cc: Charles Molster <cmolster@molsterlaw.com>; Morgan, Erin J <ejmorgan@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Goodman, Martha <mgoodman@paulweiss.com>; Craig Reilly <craig.reilly@ccreillylaw.com>

Martina <mrgoodman@pauliweiss.com>, Craig Remy <craig.remy@ccremylaw.com>

Subject: USA v. Google 1:23cv0108 - Zedo Confidential Information

Leah:

Hope all is well.

As you may recall, I also represent non-party Zedo, Inc. regarding the above-referenced matter.

Can you please let me know whether Plaintiffs intend to make any reference to Zedo at trial, and/or use any documents that reflect any Zedo information, or Zedo's name?

If Plaintiffs intend to do so, can you please identify any of the documents that include Zedo's business or other information, and any documents where Zedo's name appears in a document, and provide to me versions of such documents where any such information is unreacted so that we can make a meaningful review of the documents?

Also, consistent with Judge Anderson's ruling of July 11, 2024 (Dkt. 903), we are going to request that the Court Order that all references to Zedo's name be redacted, and/or replaced with ABC Corporation (or a similar substitute for Zedo) - can you please let me know as soon as you can whether Plaintiffs will agree to that request - per Judge Brinkema's Order of June 24, 2024 (Dkt. 871) our specific objections are due on Friday July 26, 2024, and we will be including our request at that time.

Many thanks, and happy to discuss.

Best regards,

Chip
703 346 1505

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Washington, D.C. 20007
(o) 202.787.1312
(c) 703.346.1505
cmolster@molsterlaw.com
www.molsterlaw.com

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